



April 8, 2016

Forest Climate Action Team
c/o CalFIRE Director
PO Box 944246
Sacramento, CA 94244-2460

RE: California Forest Carbon Plan Concept Paper: Managing our Forest Landscapes in a Changing Climate (Released March 9, 2016)

Dear Chair Pimlott and FCAT members:

The Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP) is a public-private, cross-sectoral partnership dedicated to promoting climate action and resilience in the Sierra Nevada region. Sierra CAMP is a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which is supported by the Governor's Office of Planning and Research, and is hosted as a project of the Sierra Business Council. Sierra CAMP is pleased to provide comments on the Draft California Forest Carbon Plan Concept Paper, dated March 9, 2016.

There is much to commend in this concept paper. We support many elements of the draft, including the vision statement bullet points, the stated purpose and scope of the document, the work done to begin estimating the amount of carbon that is and can be stored in the state's forested lands, and especially the recognition of what is at risk if we let our forests burn up in the kind of record-breaking, severely damaging wildfires we've seen over the past few fire seasons. We strongly agree that all responsible entities need to act now to return our forests to a more natural, resilient, sustainable state that contributes to, rather than impairs, overall ecosystem health.

Sierra CAMP offers the following comments and questions to help strengthen and clarify portions of the concept paper:

p. 6 – Forest Health: the figures for density as an indicator of restoration need vary widely among the three measures presented (SDI, FIA, USFS estimate); will the plan ultimately choose a single indicator to define restoration need? If so, which will it be and why?

p. 11 – Urban Forests: urban forests clearly benefit those who live in and immediately adjacent to them; but rural or wildland forests also provide important benefits to urban dwellers by virtue of the carbon and other ecosystem services they supply to downstream communities and the state overall. How is the relative benefit of rural forestland factored into the “proportionally increase[d]” benefit statement related to urban forests and human populations?

p. 12 – Attributes of a Healthy Forest: the attribute statements would be stronger if they included some indication of degree, making them more like desired conditions, similar to what

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was done in the Urban Forestry section of the paper. We need to know when/whether we've achieved the attributes or conditions in order to prioritize actions and gauge success over time. Also, regarding insects and disease, the attribute or desired condition should go beyond just *levels* of insect/disease to include the concept of endemic species vs. invasive species.

p. 12 – Co-Benefits: the evaluation of environmental, social and economic co-benefits and downstream dependencies is critical to the true cost-benefit analysis of different management strategies and actions; co-benefits and downstream dependencies must be a robust part of the ultimate carbon action plan or we will never get past uncertainties that have stymied successful forest management to date.

p. 20 – Improving Carbon Quantification: we support the notion that any valuation system needs to include full lifecycle cost accounting, including environmental, social and economic co-benefits and downstream dependencies; Sierra CAMP commits to working with partners to identify and suggest potential data and quantification methods as this process continues.

p. 22 – Wildland Forests/Protect/Strategies: we strongly support the strategy of funding conservation easements, sharing best management practices and coordinating across agencies. We suggest adding State conservancies – especially the Sierra Nevada Conservancy, given the amount of rural forest area it covers and its WIP program, called out in other parts of this concept paper, which is designed around forest and watershed health – to the list of potential State fund delivery mechanisms, given conservancies' strong relationships with forest owners in their regions. We also suggest including willing-seller fee title acquisition as a strategy, where appropriate, for permanent protection of important forestland resources.

pp. 22-23 – Wildland Forests/Enhance: there needs to be more emphasis on the benefits of reducing large, damaging wildfire as a means of reducing black carbon emissions, especially since the Short-Term Climate Pollutants Plan chose not to address wildfire as a source of black carbon, stating that the issue would be addressed instead in the Carbon Action Plan. Since wildfire accounts for the largest proportion of black carbon emissions, the State can achieve important emission reduction goals in the short-term by making that connection explicit and taking action to reduce wildfire.

p. 25 – Wildland Forests/Innovate: we also strongly support the goal of emphasizing multiple-benefit management and projects that sustainably optimize carbon storage and reduce emission potential while supporting rural communities that help steward these resources. We recommend adding to strategy #1, or including a new strategy similar to #6, to remove barriers to the production of energy from woody biomass, such as the difficulty of securing power purchase agreements. Promoting development of new or improved technologies and supporting existing and new facilities will be meaningless if there is no market for the energy produced.

pp. 25-27 – Urban Forests: we support goals and strategies for urban forestry given the many benefits urban forests contribute not only to carbon storage but also to public health and energy efficiency in the state's more developed areas. In addition to considering changing social demographics and potential displacement issues, urban forestry projects must also take potential drought conditions and resulting watering restrictions into account as part of project design.

pp. 27-28 – Analytical Approach/Management Actions: relative success should not be measured strictly by number of acres or percentage of priority area treated. This can inadvertently lead to

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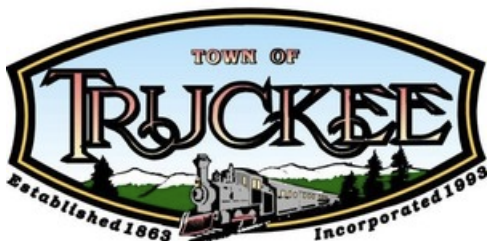
choosing less effective measures simply because they are cheaper and can be spread over more territory. Measures of success must also address outcomes from the treatment or management activity, regardless of acreage.

p. 29 – Implementation and Investment Mechanisms/Collaborative Opportunities: Sierra CAMP is a strong proponent of collaborative efforts and supports the concept of using existing collaboratives and collaborative approaches to help achieve the plan's goals. We would be very interested in working with the FCAT on a collaboration between rural forest and watershed landowners and managers and the downstream beneficiaries of forest/watershed ecosystem services on planning and implementing projects and exploring long-term investment mechanisms. This is something we are already working on as part of our involvement in ARCCA, the Alliance of Regional Collaboratives for Climate Adaptation.

p. 31 – Measuring Progress/Research and Development: in addition to funding standalone studies, the Carbon Action Plan should prioritize funding research and data collection as part of on-the-ground implementation projects. Such realtime data can be used to test concepts and refine existing methodologies.

Thank you to the Forest Carbon Action Team for this important work on the action plan concept paper. We look forward to continued engagement as the process unfolds.

All best,



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